

In the Matter of )  
 )  
Revision of the Commission's Rules ) CC Docket 94-102  
to Ensure Compatibility with Enhanced )  
911 Emergency Calling Systems )

The above-named organizations hereby inform the Federal Communications Commission (FCC) of their support of the Petition for Declaratory Ruling submitted in the above-referenced proceeding by the Association of Public-Safety Communications Officials (APCO) International.<sup>1</sup> APCO International's Petition and subsequent Supplement urge the FCC to clarify its E9-1-1 rules for wireless carriers. Specifically, APCO International urges that the specified level of accuracy for locating wireless 9-1-1 calls must be required at the local level, and not averaged over entire states. We share APCO International's concern that too large of a measurement area will leave some public safety answering points (PSAPs)

<sup>1</sup> A similar statement of support was filed on April 26, 2005, by the International Association of Chiefs of Police, Major Cities Chiefs Association, Major County Sheriffs Association and the National Association of Sheriffs.

with very poor levels of accuracy, making it difficult for first responders to locate emergencies in a timely manner.

We support APCO International's petition and firmly believe that wireless 9-1-1 accuracy should be required at the local community level. The fact remains that Phase II E9-1-1 services are requested, deployed and utilized at the local level, contracts between wireless carriers and PSAPs are initiated at the local level, and responses to calls begin at the local level.

We reiterate APCO International's request that the FCC establish clear guidance regarding the relevant geographic area in which wireless carriers must provide and test E9-1-1 accuracy to the levels specified in the FCC's rules.

	Respectfully submitted,
	INTERNATIONAL ASSOCIATION OF CHIEFS
FIRE	NATIONAL ASSOCIATION OF COUNTIES
	NATIONAL LEAGUE OF CITIES

July 20, 2005